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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TEAMLAB INC., a Japanese
 corporation,

Plaintiff,

vs.

ARTE MUSEUM LV, LLC, a Delaware
 limited liability company, D'STRICT
 HOLDINGS, INC., a Delaware
 Corporation, and D'STRICT KOREA
 INC., a Korean Corporation,

Defendants.

Case No. 2:23-cv-01956-JAD-DJA

**STIPULATION AND ORDER TO
 MODIFY EXISTING SCHEDULING
 ORDER**

[FIRST REQUEST]

Pursuant to LR IA 6-1 and 6-2, and LR ~~26-4~~²⁶⁻³, Plaintiff and Defendants stipulate,
 by and through their respective counsel, to request the Court to extend their current
 discovery deadlines by sixty (60) days.

1. On March 14 and March 29, 2024, the parties met and conferred pursuant to Rule
 26(f).

2. Since then, both sides have taken and provided significant discovery. Each side
 has responded to interrogatories and requests for production, and made multiple document
 productions, with more productions continuing on a rolling basis.

3. The parties have met and conferred regarding various discovery issues, and are
 working to resolve them without Court involvement.

4. Delays associated with having foreign clients on both sides of the case, including the need to translate documents, are slowing down the pace of discovery.

5. No depositions have been taken yet. The parties prefer to substantially complete document discovery before commencing depositions. The parties have begun discussing the scheduling of depositions, and anticipate delays given that all or most depositions of party witnesses will involve overseas travel (for witnesses and/or counsel), and some may need to be scheduled at the U.S. Consulate in Tokyo, which has limited availability for depositions (at present, the soonest that depositions may be scheduled in Tokyo is during the period of October 22 through October 31, or after November 14: *see* <https://jp.usembassy.gov/services/depositions-in-japan/>).

6. Additionally, the parties have commenced informal settlement discussions, and the parties desire to pursue settlement before having to incur substantial additional attorney's fees on depositions and other matters in the case.

7. Despite the parties' diligent efforts and progress, they agree that additional time is necessary for completing written discovery and depositions before serving their respective expert disclosures.

8. The parties believe that a 60-day extension of the discovery and disclosure deadlines will facilitate their completion of settlement discussions and, as needed, discovery.

9. The extension is not sought for any improper purpose or delay. Rather, the parties seek the extension to ensure the completion of all discovery.

In accordance with the parties' stipulated 60-day extension, the current discovery deadlines and the parties' proposed extended deadlines are:

Scheduled Event	Current Deadline	Proposed Deadline
Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	October 17, 2024	December 16, 2024
Rebuttal Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	November 18, 2024	January 17, 2025

Discovery Cut-off	December 16, 2024	February 14, 2025
Dispositive Motions	January 15, 2025	March 17, 2025
Joint Pretrial Order	February 14, 2025	April 15, 2025

This is the parties' first stipulated request for an extension of discovery. The parties respectfully submit that their reasons set forth above constitute compelling reasons for the requested extension.

WHEREFORE, the parties respectfully request that this Court extend the current discovery deadlines by sixty (60) days in accordance with the table above.

DATED this 19th day of
September, 2024.

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By: /s/ Eric Kohli

Attorneys for Plaintiff

DATED this 19th day of
September, 2024.

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ORDER

Good cause appearing, IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE
DATED: 9/23/2024